

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SEP 11 PM 4:58
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

PATRICK GRIFFIN,
LEONARD JONES, JR.,
JEROME WALTON,
ISSAC LOVE,
ROBERT HAMMOND,
ANTHONEY CARTER,
ERIC BENNETT,
NATORRIA CLARK,

Defendants.

INDICTMENT

JUDGE GAUGHAN

CASE NO.

5:18 CR 528
Title 18, Sections 924(c)(1)(A)
and (d)(1) and 2, United States
Code; Title 21, Sections
841(a)(1), (b)(1)(A) and (B),
843(b), 846, and 853, United
States Code; Title 28, Section
2461(c), United States Code

COUNT 1

(Conspiracy to Possess with Intent to Distribute and Distribution of Methamphetamine and Heroin, in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A) and (B))

The Grand Jury charges:

1. From in or around June 2015, and continuing through to at least September 2018, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants PATRICK GRIFFIN, LEONARD JONES, JR., JEROME WALTON, ISSAC LOVE, ROBERT HAMMOND, ANTHONY CARTER, ERIC BENNETT, NATORRIA CLARK, and J.C., whose identity is known to the Grand Jury, named, but not charged herein, and others, known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others, known and unknown to the Grand Jury, to possess with the intent to distribute and to distribute more than 500 grams of a mixture and substance containing a detectible amount of

methamphetamine, a Schedule II controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and more than 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:
 - a. GRIFFIN received heroin and methamphetamine from California and elsewhere for distribution.
 - b. GRIFFIN used WALTON and others to distribute heroin and methamphetamine to drug customers including but not limited to JONES, LOVE, HAMMOND, CARTER and BENNETT.
 - c. When GRIFFIN was unavailable, CLARK coordinated drug distribution and deliveries for GRIFFIN.
 - d. CARTER traveled to and from California for GRIFFIN to transport methamphetamine to GRIFFIN for distribution in Ohio.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance of the conspiracy, and to affect the goals and conceal the existence thereof, Defendants and others performed acts in the Northern District of Ohio and elsewhere, including, but not limited to, the following:
 - a. In or about June 2015, GRIFFIN and J.C. possessed approximately 107.35 grams of heroin at GRIFFIN's residence in Akron, Ohio.
 - b. On or about September 20, 2017, JONES distributed methamphetamine to a confidential source.

c. On or about December 8, 2017, JONES distributed methamphetamine to a confidential source.

d. On or about January 23, 2018, JONES distributed methamphetamine to a confidential source.

e. On or about January 23, 2018, J.C. possessed approximately eight pounds of methamphetamine.

f. On or about February 13, 2018, JONES distributed methamphetamine to a confidential source.

g. On or about March 20, 2018, JONES distributed methamphetamine to a confidential source.

h. On or about April 11, 2018, at approximately 8:22 p.m., JONES called GRIFFIN on the telephone. During the call, GRIFFIN asked, "What up?" JONES said, "S - - t, eight (eight ounces of methamphetamine)." GRIFFIN said, "Alright." JONES said, "... I went through that s - - t, didn't I?" GRIFFIN said, "Hell yeah." JONES said, "Went through, what, eight? That's eight a day." GRIFFIN said, "Hell yeah."

i. On or about April 12, 2018, at approximately 9:16 a.m., JONES called WALTON on the telephone. WALTON answered, "Yeah." JONES said, "What up with it?" WALTON said, "What's that?" JONES said, "S - - t, whatever you tell me. I'm waiting on you, your direction." WALTON said, "Ah, I'm trying to think, ah, I got to go get gas." JONES said, "Down the hill?" WALTON said, "Yeah." JONES said, "Alright. I'm here."

j. On or about April 12, 2018, at approximately 9:31 a.m., WALTON called JONES on the telephone. JONES asked, "What up, yo?" WALTON responded, "Just come up the hill and go to Allendale. I have got to go." JONES said, "Alright, if I see my dad, stay right

there.” WALTON said, “I ain’t never been over there so, I don’t know. Yeah, I’m right here.”

JONES said, “What I’m saying, my dad stay right there. I will show you where it’s at.”

WALTON asked, “What, what’s the address?” JONES said, “I don’t know the address, 969, it’s on the left hand side of, you know, though. So when you get to the block off Lover’s Lane.”

WALTON said, “I’m about to turn on Allendale now.” JONES said, “Alright.”

k. On or about April 12, 2018, at approximately 9:51 a.m., GRIFFIN called JONES on the telephone. JONES asked, “What up with it, Yo?” GRIFFIN said, “What up with it?” JONES said, “S - - t. What you doing?” GRIFFIN asked, “S - - t. He (WALTON) met up with you?” JONES said, “Hell yeah.” GRIFFIN asked, “Where did he meet you at?” JONES said, “We ended up doing it over there where my dad stay.” GRIFFIN said, “Yeah. That n - - - a crazy. I be like, where you at? He says, ‘I’m about to be late for work again.’ That’s your fault. You supposed to be at work at 9:45. You should have answered your phone at 8:45.”

l. On or about April 13, 2018, at approximately 6:49 p.m., JONES called GRIFFIN on the telephone. During the call, GRIFFIN asked, “. . . How they like that? How they like that (methamphetamine)?” JONES said, “You already know.” GRIFFIN asked, “They smiling?” JONES said, “Hell yeah, n - - - r.”

m. On or about April 28, 2018, JONES distributed methamphetamine to a confidential source.

n. On or about April 28, 2018, at approximately 11:53 a.m., JONES called GRIFFIN on the telephone. During the call, GRIFFIN said, “Call Bro (WALTON).” JONES said, “Alright.” GRIFFIN said, “Hey man, make sure it’s the whole 15 (\$1,500) too.” JONES said, “Yeah n - - - a, at a time like this, come on, dog. I ain’t on no s - - t like that, dog. I will call you. Hoe a - - n - - - r. Come on, man.” GRIFFIN said, “No, I’m saying. . . .” JONES

said, "N - - - r, you already know, n - - - r. I wish it would be something." GRIFFIN said, "Alright."

o. On or about April 28, 2018, at approximately 11:54 a.m., JONES called WALTON on the telephone. WALTON said, "Yeah." JONES said, "S - - t. I'm on, getting on the eway." WALTON said, "Alright. I'm on my, alright." JONES said, "Alright."

p. On or about May 8, 2018, at approximately 7:14 p.m., GRIFFIN called LOVE on the telephone. LOVE said, "Hello." GRIFFIN responded, "What up, bro? I was sleep. What's good?" LOVE said, "D - - n, bro. If you can come f - - k with me right now. You need to come f - - k with me, man. Because I got your spread (money). And I got big play (need to purchase a large quantity of drugs), bro. On everything." GRIFFIN asked, "What you (UI)?" LOVE responded, "One and a half (150 grams of methamphetamine)." GRIFFIN said, "Alright." LOVE asked, "Ok. For sure?" GRIFFIN said, "Yep. For sure." LOVE asked, "How long? Because they (customers) waiting right now." GRIFFIN said, "About a half hour." LOVE said, "I just now hollered at them. They waiting right now." GRIFFIN said, "About a half hour." LOVE said, "Alright. S - - t. Alright, that's cool." GRIFFIN said, "Yep."

q. On or about May 8, 2018, at approximately 7:18 p.m., GRIFFIN called WALTON on the telephone. During the call, GRIFFIN said, "Hey, I need you to, ah, grab me, ah, mother f - - - ing, ah, one an a half liters of that Ciroc (150 grams of methamphetamine). The big . . . the big baby. . . . Ah, ah, two cran, ah, one cranberry juice (one ounce of drugs) and one big one and one cranberry juice, for the little one (HAMMOND)." WALTON said, "Alright." GRIFFIN said, "Around the . . . around the corner." WALTON said, "Oh, d - - m. Alright. . . . I'm trying to think." GRIFFIN said, "That dude's spot." WALTON said, "I know, but I'm saying, though, but I ain't, ah, but I ain't, ah, he (HAMMOND), he drank that straight

yesterday.” GRIFFIN said, “Ah, yeah, but, ah” WALTON said, “I could, um, I’m saying, though, like half a pint (WALTON only had half an ounce of methamphetamine). Mother f - - -ing, um, I could mix that one (add cut to the methamphetamine).” GRIFFIN said, “That’s cool. That’s cool.” WALTON said, “Alright.”

r. On or about May 8, 2018, at approximately 7:29 p.m., GRIFFIN called HAMMOND on the telephone. During the call, GRIFFIN asked, “What you got going on?” HAMMOND responded, “S - - t, nothing. I had called you earlier, man. I thought my dude was bulls - - - ting, man. He, ah, I had showed him that mother f - - - er. He’s like, ah, this don’t look that good, looks slushy, like it got cut on it. I’m like, come on, man. You on some bulls - - -t. So he act like he wanted to get half of it, but I made, I made, ah, I got rid of the whole thing, though. I have, I had fat boy to get the other half. He had said the same thing. And then, um, I had bro come check it out. Bro was like, ah, tell bro next time he go, you might want to put it in. He said it isn’t bad, but, you might want to tell them that they putting a little something on it.” GRIFFIN said, “Oh, yeah.” HAMMOND said, “Yeah. He said because, like, the chips gon’ be, like, they should look flat and straight. He said they oval. He said they, like, he said it’s some good ass ice [methamphetamine]. They just putting a little bit on it, and it’s, and it’s, and that cut is sticking on it.” GRIFFIN said, “Yeah.” HAMMOND said, “He said that s - - t’s some fire. And I end up, ah, I just forced fat boy. I’m like, come on, man. He’s like, man, this, I forced him to get it, so, I got all your money, though.” GRIFFIN said, “Alright.” HAMMOND responded, “Hell, yeah. So I can’t, I’m waiting for two people to pull up on me right now. So I can either bring it [money] to you when they come or you can have bro come grab it. Either or.” GRIFFIN said, “Just bring it when they come on. I don’t know where that n - - - r’s at.” HAMMOND said, “Ok.”

s. On or about May 9, 2018, at approximately 7:34 p.m., HAMMOND called GRIFFIN on the telephone. During the call, HAMMOND said, "Fat boy had just called me, Bro. Bro, he said that s - - t terrible [methamphetamine was bad quality], Bro. . . [h]e put his dude on speaker phone, he, like, 24 of them slams [grams], like, when my peoples put it in the thing, it wasn't even doing nothing. It was just, like, bubbling like it was some work." GRIFFIN said, "Oh yeah?" HAMMOND said, "Yeah." GRIFFIN asked, "How much of that s - - t he got left?" HAMMOND said, "Uh, he got, uh, he said he got rid of all of it except, like, uh, two zips [two ounces]. And, he, like, uh dude, basically, he was like, man, can you call your dude? He said, Bro, I don't really like complaining but, he was like, if I would had known. He said with them two zips [two ounces] he just going to mix it with the s - - t he got from Bro. And, uh, he was like, uh, man, dude on this, dude at, dude want his money, basically. Dude be coming through a half of P [half a pound of methamphetamine] everyday, Bro. S - - t. I got to, I got to do something. He was like, he only wants the 24 grams. He was like, 'cause he was like, man, that s - - t ain't, ain't word [not good quality]. And I was like, and I was trying, and he was back and forth, and then just left. But I got to run out to the Falls real quick, and uh, pull up on Jamie, but he, like, uh, he had 'ol Bro, \$100 and he said when he come back, I'll just call my dude when you get back and he was like, alright." GRIFFIN asked, "What he want? 24 grams?" HAMMOND responded, "Uh, I don't know. He was just, like, he was like, you got to replace dude's s - - t. And he was like, he was like, I don't know. I mean if it, if it good and, like, when he called me for the two today, he was like, man, he was like, man, man that s - - t was high and it wasn't good, Bro. And I called Bro, and Bro was like, it just got in or whatever and he got two off bro and he like, he's comparing. He was like, man, this s - - t look way different. And I said, I told you, when you was complaining the first time, n - - - r. Don't even get it and would have

just, just gave it back. Know what I mean? . . . So I don't know. I don't know if you want to holler at your peoples and let them know." GRIFFIN said, "Yeah, yep." HAMMOND said, "But, uh, I mean when, if he don't say nothing, he don't say nothing. But when he get, he probably is, though, when he get back and say something, I, you know. What, you got some s - - t that look different?" GRIFFIN said, "Yeah. I got some different s - - t." HAMMOND said, ". . . he was like, tell, tell your dude I'm going to get, I'll get like four, five a week but they got to look good. You know what I mean?" GRIFFIN said, "Alright." HAMMOND said, "Alright, so when he get back, I'll, I mean I'll, uh, I'll see what he's trying to do." GRIFFIN said, "Yup."

t. On or about May 11, 2018, at approximately 8:24 p.m., LOVE called GRIFFIN on the telephone. GRIFFIN answered, "Hello." LOVE responded, "Hello. My bad, bro. Tell bro we going to the apartments, man." GRIFFIN said, "Which ones is those?" LOVE said, "The apartments. He know where they at. The apartments in the back." GRIFFIN said, "Oh, the second ones?" LOVE said, "Yeah." GRIFFIN said, "Alright, and there is only one of them b - - es left." LOVE said, "D - - n, for real?" GRIFFIN responded, "Yep." LOVE said, "You still got the four of them joints, though, right?" GRIFFIN said, "Yeah. Yep." LOVE said, "Alright. F - - k it then. It is what it is." GRIFFIN said, "Yep."

u. On or about May 11, 2018, at approximately 8:42 p.m., CARTER called GRIFFIN on the telephone. During the call, CARTER asked, "What's up with you?" GRIFFIN said, "S - - t, seeing if you was ready." CARTER said, "Hell yeah. You already know, brother. For (UI)." GRIFFIN said, "Yeah, I'm shooting for tomorrow. I'm going to let you know when I put everything together." CARTER said, "Ok."

v. On or about May 11, 2018, at approximately 9:33 p.m., WALTON called GRIFFIN on the telephone. WALTON said, "Hey, tell him I'm on my way to drop that liquor (drugs) off now." GRIFFIN said, "Alright. He at the apartments." WALTON said, "Oh, my God, man." GRIFFIN said, "And I meant to tell you that I needed that, ah, that thing, thing." WALTON asked, "What?" GRIFFIN said, "N - - - r, the refrigerator (luggage) we be storing the liquor (drugs) in. . . . You can bring it first thing in the morning if you want to." WALTON asked, "The ruler (scale)?" GRIFFIN said, "No, the freezer (luggage) that we be storing the liquor (drugs) in." WALTON said, "Oh, ok."

w. On or about May 12, 2018, at approximately 8:35 a.m., GRIFFIN called CARTER on the telephone. During the call, GRIFFIN said, "Hey. My peoples about to drop that off to you, then my white b - - - h going to come get you about 11:30." CARTER said, "11:30?" GRIFFIN said, "(UI) about to drop that off to you. Alright." CARTER said, "Yeah. You know. I'm up. Ready like a mother f - - - r."

x. On or about May 12, 2018, at approximately 9:26 a.m., GRIFFIN called J.C. on the telephone. J.C. told GRIFFIN that he was at CARTER's house. During the call, CARTER spoke with GRIFFIN. GRIFFIN asked, "Hey. If you all go get some smoke, who going to watch the bag?" CARTER responded, "[M]y girl, you know, Bro. She, you know what I mean, none of that s - - t. I just went and dropped it off. She don't even know where it at, type s - - t. But you know." GRIFFIN said, "Alright." CARTER said, "But she cool. No second guessing with her brother." GRIFFIN said, "Alright. She don't know where it's at, though, do she?" CARTER said, "Hell no, nope. You know me. I told you. I'm like (UI), brother."

y. On or about May 12, 2018, at approximately 12:26 p.m., J.C. called GRIFFIN on the telephone. GRIFFIN's minor daughter N.S. relayed information to J.C. and

CARTER. N.S. said, "He [GRIFFIN] said the flight is through United." J.C. said, "Alright, tell him, ok. Alright." N.S. said, "He said 'Show your I.D.'" J.C. said, "Tell him to show his I.D.?" N.S. said, "Yeah." J.C. said, "Ok." Later in the call, N.S. said, "He said the flight is 2:20." CARTER spoke to N.S. and said, "Hold on, Bro. . . . Ok, ok, cuz. I got, 2:20, ok." N.S. said, ". . . He said it's through United." CARTER said, "I already know. Ok."

z. On or about May 12, 2018, at approximately 2:12 p.m., CLARK called CARTER on GRIFFIN's telephone. CLARK spoke to CARTER on GRIFFIN's behalf. During the call, CLARK said, "You at Akron?" CARTER responded, "Yes. I'm still, yet at the airport. They actually, ah, when I made it here and I came to bring my information to board United, they told me they been taking off so I got to get on another one at 5:00. But I still have my luggage and everything so I haven't gone through nothin' yet. So I gave them my I.D. and it's scheduled for like 5:30. Make it there at 10:35." CLARK asked, "What took you so long?" CARTER said, "I don't know what it was. I just came straight in and went straight to the people, and they was telling me that they, they been had boarded the plane. I knew mine was 2:20, so, I asked them and they said they been scheduled to get on the plane to leave, so. They gave me like five something." CLARK said, "He said he talked to you at 12:30." CARTER said, ". . . yep and then as soon as my ride got me here, I came straight up here." CLARK said, "Couldn't be." CARTER said, "Gave them my I.D. and everything. But I didn't do my luggage or anything. There was something with the plane. I mean, I guess the timer was gone, because they been loaded the plane. When I came, I had more than, I had . . . I was an hour and 25 minutes early. By the time I made it here, I was an hour and 25 minutes early, and I went right to the people and came straight in. Gave them my I.D. and everything. They said the people been had boarded the plane. They gave me the five one." CLARK said, "Ok. Ok. He'll call you later." CARTER

said, "Ok. Tell him I'm going to call him as soon as I, you know, touch, though. It's like ten something. Or call when I land in Chicago." CLARK said, "Ok." CARTER said, "Ok. Most def."

aa. On or about May 13, 2018, at approximately 3:03 p.m., GRIFFIN called LOVE on the telephone. LOVE said, "It's a wrap, though. It's wrapped up, s - - t." GRIFFIN asked, "What you have (money) for me?" LOVE said, "S - - t, what I owed you. The 49 (\$4,900)." GRIFFIN said, "Alright. What mall you at?" LOVE responded, "Chapel Hill." GRIFFIN asked, "How long you about to be up there?" LOVE said, "S - - t, not too much longer. About 15 minutes, something like that." GRIFFIN said, "About to have JD pull up on you." LOVE said, "Alright. That's cool. . . .What's up with the demo, though?" GRIFFIN said, "I got to, when you leaving?" LOVE said, "I say around six, at the latest, s - - t." GRIFFIN said, "Let me see what's up. Let me see what's up with my brother." LOVE said, "Alright." GRIFFIN said, "Yep."

bb. On or about May 13, 2018, at approximately 7:24 p.m., GRIFFIN called BENNETT on the telephone. GRIFFIN said, "I was back together though [GRIFFIN had drugs to sell]." BENNETT responded, "Alright. Hell yeah. Soon as I get this s - - t [drugs] gone, I'm going to call you." GRIFFIN said, "Yep." BENNETT said, "Alright."

cc. On or about May 13, 2018, at approximately 9:10 p.m., GRIFFIN called CARTER on the telephone. GRIFFIN asked, "You with Bro yet?" CARTER said, "Hello. What up with it, Bro? He went in, Bro. I was just about to call you too, for real." GRIFFIN said, "Oh. You already done?" CARTER said, "No. Not yet." After discussing CARTER's location, GRIFFIN asked, "Where y'all get it at last time?" CARTER said, "Yep. You know. The spot, at the spot now." GRIFFIN said, "Where Bro at?" CARTER said, "Went in."

GRIFFIN said, "Oh. He went in?" CARTER said, "Yep. It's the same mother f - - r, though." GRIFFIN said, "Alright. Yep. Call me when it go down." CARTER said, "Everything, yep. Yep."

dd. On or about May 13, 2018, at approximately 9:28 p.m., GRIFFIN called CARTER on the telephone. GRIFFIN asked, "He come out yet?" CARTER said, "Yep." GRIFFIN asked, "Everything cool?" CARTER responded, "Yeah. Hell yeah." GRIFFIN asked, "Hey, ask him, this time is it more chunkier?" CARTER said, "... He said he looked at it. Kind of the same like last s - - t." Later in the conversation, GRIFFIN said, "Pay for one more night. ... You'll slide out the next night. That will be better." CARTER said, "Alright." GRIFFIN asked, "That's cool with you?" CARTER said, "Yep. Yep."

ee. On or about May 13, 2018, at approximately 10:22 p.m., GRIFFIN called CARTER on the telephone. During the conversation, GRIFFIN said, "[M]ake sure he put that s - - t in there nice and neat, how I had it. ... What kind of crib he be going into?" CARTER said, "... Like in the hood type s - - t. Nothing but Mexicans. Man, Bro came out that mother f - - - r sweating like a mother f - - - r, boy. You know it's probably like, d - - n near, ten Mexicans in his face all over him. He came right out of there and told me, he was like, boy, they had me sweating like a mother f - - - r." GRIFFIN said, "Hell yeah." CARTER said, "Standing over him. But, you know, they cool people, you know." GRIFFIN said, "Hell yeah."

ff. On or about May 15, 2018, at approximately 11:36 p.m., CARTER texted GRIFFIN on the telephone. CARTER texted, "We got pulled over bro" and "They said his driving." GRIFFIN texted, "Is yaw ok?" CARTER texted, "Idk they searching tho ... But if so it's all mine I'm solid brother."

gg. On or about May 15, 2018, CARTER and WALTON possessed approximately ten pounds of methamphetamine.

hh. On or about May 18, 2018, at approximately 6:16 p.m., GRIFFIN called HAMMOND on the telephone. GRIFFIN said, "Hey, I'm outside. Hey bring Bro a border [quarter ounce of heroin]." HAMMOND said, "You outside?" GRIFFIN said, "Bring Bro a border. Bring Bro a border too." HAMMOND responded, "Alright. Alright."

ii. On or about May 19, 2018, at approximately 8:07 p.m., LOVE called GRIFFIN on the telephone. LOVE asked, "What's up with you tonight. You going to be able to make it out?" GRIFFIN said, "Yeah. What (UI) like, like 50 of them?" LOVE said, "That's cool."

jj. On or about May 20, 2018, at approximately 8:40 p.m., GRIFFIN called BENNETT on the telephone. GRIFFIN said, "I'm going to call you when Rome call me." BENNETT said, "Alright, cool. . . . [UI] the other 75." GRIFFIN said, "I'm going to have him, what he gave you, 25?" BENNETT responded, "No. He gave me 28. My bad. He gave me 28." GRIFFIN asked, "So 72?" BENNETT said, "Yeah, 72."

kk. On or about May 23, 2018, at approximately 9:06 a.m., GRIFFIN called BENNETT on the telephone. During the call, GRIFFIN asked, "[W]hat you got?" BENNETT said, "Huh?" GRIFFIN said, "What you got?" BENNETT said, "S - - t. I got two bands [\$2,000] on me." GRIFFIN said, "Alright. I'm about to have him call you." BENNETT said, "Alright. What you going to do?" GRIFFIN responded, "I don't know. I got to see what he got over there." BENNETT said, "Alright."

ll. On or about May 25, 2018, at approximately 9:12 p.m., HAMMOND called GRIFFIN on the telephone. CLARK spoke to HAMMOND on GRIFFIN's behalf.

HAMMOND said, "Hello. Hello." CLARK responded, "He said what's up." HAMMOND responded, "Tell him [GRIFFIN] I called him last night. I was going to the clutch. I was seeing if he wanted to go up there with me. Tell him that when I had called him earlier, I had needed him for something. I needed to have bro [WALTON] blow down on me 80 [80 grams of heroin]." CLARK said, "Ok." HAMMOND said, "Ok. Tell him I'm at home watching the game. I'm not going anywhere. . . . Tell bro to call before it get here." CLARK responded, "Alright."

mm. On or about May 25, 2018, at approximately 9:14 p.m., CLARK called WALTON on GRIFFIN's telephone. CLARK said, "He [GRIFFIN] said Turk [HAMMOND] wanted 80 of your kid's Pokemon cards [grams of heroin]." WALTON said, "Alright, yeah. That's cool." CLARK said, "He [GRIFFIN] said, 'and Dre wanted to borrow your Glock .45.'" WALTON responded, "Alright, that's good. It's Memorial Day weekend. I'm not carrying that muscle with me anyway. So, yeah. He can get it." Later in the call CLARK said, "He [GRIFFIN] said call him when you get done with everything." WALTON responded, "Alright. Tell him I will."

nn. On or about May 26, 2018, at approximately 3:02 p.m., GRIFFIN called BENNETT on the telephone. BENNETT, referring to the seizure of ten pounds of methamphetamine from WALTON and CARTER, asked, "It's hot?" GRIFFIN responded, "I'm not f - - - ing with that Cali s - - t no more. [C]lose call, bro, for 52 bands [\$52,000]. . . . What's so crazy, though, how they did it. They had red flagged the bag, but when I, my dude, though, he was so smart. He was like, he called me. He was was like, bro, they on me. Like s - - t. You and the b - - - h switch the bag. As soon as you all get here. So they switched the bag and, ah, they yanked the b - - - h, but, he had the bag with the s - - t in it. They yanked the b - - - h [UI]

that they was swerving. And they bring the dogs and s - - t and they made the dog hit on the car. Searched the b - - - h suitcase [and] and find s - - t in there. I'm cool on that s - - t." BENNETT said, "Man, f - - k that s - - t."

oo. On or about May 26, 2018, at approximately 8:17 p.m., GRIFFIN called CLARK on the telephone. During the call, GRIFFIN said, "You might as well go grab that [money] from Turk [HAMMOND]." CLARK responded, "What?" GRIFFIN said, "You're right on Brown. I'm going to call him and tell him you about to be outside." CLARK said, "Alright."

pp. On or about May 26, 2018, at approximately 8:19 p.m., GRIFFIN called HAMMOND on the telephone. GRIFFIN said, "Yeah, she [CLARK] about to pull up in like three, four minutes." HAMMOND said, "Ok. Ok. Ok. Ok." Later in the conversation, GRIFFIN asked, "What you want for a border [quarter ounce] of it [heroin]." HAMMOND responded, "Like 35 [\$3,500]." GRIFFIN said, "Give him. . . ." HAMMOND said, "I've been selling them for 40 [\$4,000], but I'll do it for 35 [\$3,500]." GRIFFIN said, "What you want for half a border?" HAMMOND said, "25 [\$2,500]." GRIFFIN said, "Give it to us for 20 [\$2,000]." HAMMOND said, ". . . Ok, ok. He going to bring it or do you want me to take it out of that money?" GRIFFIN said, "Take it out of that money. He with my girl." HAMMOND said, "Ok, ok, ok, ok. That's cool. So that will be 72 [\$7,200]? So that will be \$7,180. . . . And that mother f - - - er shorted me. . . . It was only 85 dollars [\$8,500]." GRIFFIN later said, "I think she outside." HAMMOND said, "I'm rooting for the rockets, though." GRIFFIN said, "I think she outside." HAMMOND said, "Hold on. Let me call you back. Let me get it together." GRIFFIN said, "Yep."

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute Methamphetamine,
in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and 18 U.S.C. § 2)

The Grand Jury further charges:

4. On or about May 15, 2018, in the Northern District of Ohio, Eastern Division, Defendants JEROME WALTON and ANTHONY CARTER did knowingly and intentionally possess with the intent to distribute over 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT 3

(Attempted Possession with Intent to Distribute Methamphetamine,
in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

5. On or about May 15, 2018, in the Northern District of Ohio, Eastern Division, Defendant PATRICK GRIFFIN did knowingly and intentionally attempt to possess with the intent to distribute over 500 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

COUNT 4

(Possession of a Firearm in Furtherance of a Drug Trafficking Offense,
in violation of 18 U.S.C. § 924(c)(1)(A))

The Grand Jury further charges:

6. On or about May 15, 2018, in the Northern District of Ohio, Eastern Division, Defendant JEROME WALTON, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, those being, Conspiracy to Possess with intent to

Distribute and Distribution of Controlled Substances charged in Count 1 and Possession with Intent to Distribute a Controlled Substance charged in Count 2, did knowingly possess a firearm in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNTS 5 - 18

(Use of a Communication Facility in Furtherance of a Drug Trafficking Crime,
in violation of 21 U.S.C. § 843(b) and 18 U.S.C. § 2)

The Grand Jury further charges:

7. On or about the approximate dates and times listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants listed below did knowingly and intentionally use any communication facility, to wit: a telephone, in committing, causing to be committed, and facilitating acts constituting a felony under Title 21, United States Code, Section 846, that is, conspiracy to possess with the intent to distribute and to distribute methamphetamine and heroin as charged in Count 1:

Count	Defendant(s)	Date	Approximate Time
5	LEONARD JONES, JR. and PATRICK GRIFFIN	April 11, 2018	8:22 p.m.
6	LEONARD JONES, JR. and PATRICK GRIFFIN	April 11, 2018	11:53 a.m.
7	ISSAC LOVE and PATRICK GRIFFIN	May 8, 2018	7:14 p.m.
8	JEROME WALTON and PATRICK GRIFFIN	May 8, 2018	7:18 p.m.
9	ROBERT HAMMOND and PATRICK GRIFFIN	May 9, 2018	7:39 p.m.
10	ANTHONEY CARTER and PATRICK GRIFFIN	May 11, 2018	8:42 p.m.
11	NATORRIA CLARK and ANTHONEY CARTER	May 12, 2018	2:12 p.m.
12	ISSAC LOVE and PATRICK GRIFFIN	May 13, 2018	3:03 p.m.
13	ANTHONEY CARTER and PATRICK GRIFFIN	May 13, 2018	9:28 p.m.
14	ROBERT HAMMOND and PATRICK GRIFFIN	May 18, 2018	6:16 p.m.

15	ERIC BENNETT and PATRICK GRIFFIN	May 20, 2018	8:40 p.m.
16	NATORRIA CLARK and JEROME WALTON	May 25, 2018	9:14 p.m.
17	ERIC BENNETT and PATRICK GRIFFIN	May 26, 2018	3:02 p.m.
18	NATORRIA CLARK and PATRICK GRIFFIN	May 26, 2018	8:17 p.m.

All in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

FORFEITURE

The Grand Jury further charges:

8. For the purpose of alleging forfeiture pursuant to 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), the allegations of Counts 1 through 18, inclusive, are incorporated herein by reference. As a result of the foregoing offenses, Defendants PATRICK GRIFFIN, LEONARD JONES, JR., JEROME WALTON, ISSAC LOVE, ROBERT HAMMOND, ANTHONY CARTER, ERIC BENNETT, and NATORRIA CLARK shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all property (including firearms and ammunition) involved in or used in the commission of such violations; including but not limited to the following:

- a. SCCY Industries, LLC., model CPX2, 9 mm handgun, serial number 431755; and
- b. Miscellaneous ammunition.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.